

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MEAGAN CAREY,)
)
Plaintiff,)
)
v.) Case No. 05C 5961
) Judge Lindberg
THE 900 NORTH MICHIGAN) Magistrate Judge Valdez
SURGICAL CENTER, LLC and)
MAGNA HEALTH SYSTEMS, LLC,)
)
Defendants.)

**DEFENDANTS' UNCONTESTED MOTION FOR LEAVE TO FILE AN AMENDED
ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT AT LAW**

Defendants, The 900 North Michigan Surgical Center, LLC and Magna Health Systems, LLC (“Defendants”), by and through their attorneys, respectfully request leave to file an Amended Answer and Affirmative Defenses to Plaintiff’s Complaint at Law. Plaintiff’s counsel has stated that they have no objection to this Motion. In support of this Motion, Defendants state the following:

1. Defendants filed their Answer and Affirmative Defenses with the Court on January 13, 2006.
2. After filing, it came to Defendants’ attention that the paragraph numbers were missing from their Answer due to some inadvertent technical difficulties.
3. Defendants are asking leave to file an Amended Answer, a copy of which is attached hereto as Exhibit A, in order to insert the missing paragraph numbers.
4. Plaintiff’s counsel has stated that they have no objection to this Motion.

WHEREFORE, Defendants, The 900 North Michigan Surgical Center, L.L.C. and Magna Health Systems, L.L.C., respectfully request leave to file their Amended Answer and Affirmative Defenses to Plaintiff's Complaint at Law.

Dated: January 20, 2006

THE 900 NORTH MICHIGAN SURGICAL
CENTER, LLC and MAGNA HEALTH
SYSTEMS, LLC

By: /s/Jennifer A. Naber
One of Their Attorneys

Jennifer A. Naber
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CERTIFICATE OF SERVICE

Jennifer A. Naber, an attorney, hereby certifies that she caused the **Defendants' Motion for Leave to File An Answer and Affirmative Defenses to Complaint at Law and Notice of Motion** in the above-captioned matter to be served on the party of record listed below, by via electronically and by placing same in the U.S. mail located at 515 North State Street, Suite 2800, Chicago, Illinois 60610, postage prepaid, before the hour of 5:00 p.m. on this 20th day of January, 2006, addressed to:

Thomas G. Gardiner
Collette A. Walsh
Gardiner Koch & Weisberg
53 West Jackson Boulevard
Suite 950
Chicago, IL 60604
(312) 362-0000

/s/Jennifer A Naber
Jennifer A. Naber